

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEREMY BAILEY,  
PLAINTIFF,

NO. 1:20-CV-1836

V.

DISTRICT JUDGE: KANE

LIEUTENANT YODER,  
SERGEANT R. BATIUK,  
C/O DERR,  
C/O ANTHONY,  
DEFENDANT,

FILED  
SCRANTON

OCT 04 2021

PER

DEPUTY CLERK

THIRD SET OF INTERROGATORIES TO DEFENDANT

In accordance with Rule 33 of the Federal Rule of Civil Procedure, Plaintiff requests that Defendant lieutenant Yoder answer the following interrogatories under oath, and that the answer be sign by the one making them and be serve on plaintiff within 30 days of service of these interrogatories.

If you can not answer the following interrogatories in full, after execising due diligence in to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deem continuing, so as to require supplemental answers as new and different information materializes.

QUESTIONS

1. State and name, what shift commander gave the order for z- code inmate McCullough # GA- 6396 to be remove from his assign cell 14, and place in cell 5 with inmate Bailey # LZ- 4437 on sept, 10 2019.
2. During a unrelating incident in the R. H. U. pod 1, on sept, 10 2019 involving a inmate name Eric Johnson, was you one of the responding officers on the unit the unit at moment.
3. on the unit cell housing sheet, do it show whether inmate McCullough GA- 6396 was a z- code or not.



JEREMY BAILEY, PLAINTIFF

(SCI) COALTOWNSHIP

1 KELLEY DRIVE

COALTOWNSHIP, PA 17866.

Date: 9.29.2021